

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

Gregory Boyer,

Plaintiff,

v.

Advanced Correctional Healthcare, Inc.,
et al.,

Defendants.

Case No: 3:20-cv-1123-JDP

Judge James D. Peterson

Magistrate Judge Anita M. Boor

Gregory Boyer,

Plaintiff,

v.

USA Medical & Psychological Staffing, Inc.,
et al.,

Defendants.

Case No: 3:22-cv-00723-JDP

Judge James D. Peterson

Magistrate Judge Anita M. Boor

AMENDED PLAINTIFFS 26(a)(3) DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(3), Plaintiff Gregory Boyer, by and through his attorneys, Loevy & Loevy, submit the following pretrial disclosures:

TRIAL WITNESS LIST

WILL CALL

1. Gregory Boyer. Witness may be contacted through counsel. Witness may testify regarding Ms. Boyer's background, her activities in the days before she entered the Jail's custody, communications with the jail and Ms. Boyer while she was in custody, and damages.

2. Lisa Pisney. Witness may testify concerning her own conduct as alleged in the complaint, her interactions with other Jail staff, Ms. Boyer's healthcare at the Jail, as well as the policies and practices of Monroe County and Advanced Correctional Healthcare, Inc. ("ACH") with respect to the provision of medical care.

3. Amber Fennigkoh. Witness may testify concerning her own conduct as alleged in the complaint as well as her interactions with Ms. Boyer, Plaintiff, and other Jail staff; Ms. Boyer's healthcare at the Jail; and the practices of Monroe County and ACH with respect to the provision of medical care.

4. Dr. Suzanne Bentley Dr. Bentley is disclosed as an expert under Rule 702. She is expected to testify as to any and all opinions arrived at in her previously disclosed expert report and any deposition testimony provided in this case. Dr. Bentley's CV and rate of compensation were previously disclosed. Contact through counsel.

5. Dr. Bruce Charash Dr. Charash is disclosed as an expert under Rule 702. She is expected to testify as to any and all opinions arrived at in his previously disclosed expert report and any deposition testimony provided in this case. Dr. Charash's CV and rate of compensation were previously disclosed. Contact through counsel.

6. Dr. Homer Venters Dr. Venters is disclosed as an expert under Rule 702. He is expected to testify as to any and all opinions arrived at in his previously disclosed expert report and any deposition testimony provided in this case. Dr. Venters's CV and rate of compensation were previously disclosed. Contact through counsel.

MAY CALL

7. Stan Hendrickson. Witness may testify concerning his own conduct as alleged in the complaint as well as the practices of Monroe County and ACH with respect to staff's provision of medical care.

8. Danielle Warren. Witness may testify concerning her own conduct as alleged in the complaint as well as the practices of Monroe County and ACH with respect to staff's provision of medical care.

9. Shasta Parker. Witness may testify concerning her own conduct as alleged in the complaint as well as the policies and practices of Monroe County and ACH with respect to staff's provision of medical care.

10. Lt. Jeffrey Spencer. Monroe County Sheriff investigator. May testify concerning the investigation into Ms. Boyer's death.

11. Dr. Michel A. Stier, Anatomic Pathology Laboratory, 600 Highland Ave., Madison, WI 53792. Dr. Stier performed Ms. Boyer's autopsy and may testify concerning his findings relating to same.

12. Lt. Jeffrey Spencer. Monroe County Sheriff investigator, who may testify concerning the investigation into Ms. Boyer's death.

13. Dr. Michel A. Stier, Anatomic Pathology Laboratory, 600 Highland Ave., Madison, WI 53792. Dr. Stier performed Ms. Boyer's autopsy and may testify concerning his findings relating to same.

14. Lucas Runice, Monroe County. C/o Monroe County counsel. Mr. Runice is expected to testify consistent with the deposition testimony he gave in this case.

15. Brooke Dempsey, Monroe County. C/o Monroe County counsel. Ms. Dempsey is expected to testify consistent with the deposition testimony she gave in this case.

16. Travis Schamber, c/o USA Medical counsel. Mr. Schamber is expected to testify consistent with his deposition, and his knowledge of Lisa Pisney and Amber Fennigkoh's provision of medical care and training.

17. Abi Chrudimsky. Former employee of Advanced Correctional Healthcare, Inc. who was previously staffed as a nurse at the Monroe County Jail who may testify concerning Lisa Lisney and Amber Fennikgoh's provision of healthcare and the practices with respect to the provision of healthcare at the Monroe County jail.

18. Ken and Paula Cebertowicz. Christine Boyer's brother and his spouse, who testify concerning Ms. Boyer's background and damages in the case.

19. Hershey Suri. Loevy & Loevy employee serving as a prover regarding a November 3, 2023 phone conversation between plaintiff's counsel and Abi Chrudimsky. Contact through counsel.

20. Dr. Richard Erdman. Dr. Erdman was Christine Boyer's primary care physician. Dr. Erdman testify concerning Ms. Boyer's chronic health problems, his care of Ms. Boyer, whether he was contacted by anyone at the Jail, and what he would have done if he had been contacted. Dr. Erdman is expected to testify as to the care he provided to Christine Boyer. Tomah Family Medicine, 505 Gopher Drive, Tomah, WI 54660.

21. Teresa Isensee. Ms. Isensee is the Chief Deputy Medical Examiner for Monroe County and held this position at the time of Christine Boyer's death. Monroe County Medical Examiner, 112 S. Court St., Rm 1005, Sparta, WI 54656.

22. Michael A. Stier. Dr. Stier is a pathologist consulted by the Monroe County Medical Examiner for the purposes of Christine Boyer's autopsy report. Anatomic Pathology Laboratory, 600 Highland Ave., Madison, WI 53792.

23. Dr. Faraaz Zafar. Dr. Zafar is a physician who provided care and treatment to Christine Boyer on or after December 23, 2019. Gunderson Health System, 1900 South Ave., La Crosse, WI 54601.

24. Dr. Jasmine Hudnall. Dr. Hudnall is a palliative care physician who provided care and treatment to Christine Boyer on or after December 23, 2019. Gunderson Health System, 1900 South Ave., La Crosse, WI 54601.

25. Dr. Renata Chalfin. Dr. Chalfin is a neurologist who provided care and treatment to Christine Boyer on or after December 23, 2019. Gunderson Health System, 1900 South Ave., La Crosse, WI 5460.

26. Jerry Gedig. Ms. Boyer's father, who may testify concerning Ms. Boyer's background and damages in this case.

27. Jodi Gedig. Ms. Boyer's sister, who may testify concerning Ms. Boyer's background and the damages in this case.

28. James and Amy Buchan. Family friends, who may testify concerning Ms. Boyer's background and the damages in this case.

29. Dr. Bruce Pollander. Former family doctor, who may testify concerning Ms. Boyer's medical history.

Plaintiff also reserves the right to call any witness identified by Defendants in their Rule 26(a)(3) disclosures.

TRIAL EXHIBIT LIST

1. MONROE_COUNTY_001518 Audio Call

2. MONROE_COUNTY 2008 Video File
3. July 5, 2019 Email from Amber Fennigkoh to Travis Schamber (MONROE_COUNTY_056584)
4. July 4, 2019 Email from Amber Fennigkoh to Stan Hendrickson (MONROE_COUNTY_017959)
5. December 23, 2019 Narrative Progress Notes (MONROE_COUNTY_001105)
6. December 23, 2019 Narrative Progress Notes (MONROE_COUNTY_001101)
7. December 20, 2018 Email from Hallman to Hendrickson and Fennigkoh (MONROE_COUNTY_015575)
8. ACH Training Slides (ACH 18912–19147)
9. Advanced Practice Nursing Written Collaborative Agreement (ACH 14010–12)
10. Agreement for the Provision of Inmate/Detainee Health Services (MONROE_COUNTY_000019–45)
11. P012443 Union Subpoena Response - Video
12. Introduction to Correctional Healthcare Video (ACH 13404)
13. Detox in Jails Video (ACH 13403)
14. Jail is not a Health Spa Video (ACH 13402)
15. Deposition of Boyer, Gregory
16. Deposition of Chrudimsky, Abi
17. Deposition of Dempsey, Brooke
18. Deposition of Charash, Bruce
19. Deposition of Erdman, Eric
20. Deposition of Hallman, Ryan
21. Deposition of Hendrickson, Stan
22. Deposition of Moga, Kyle

23. Deposition of Pisney, Lisa
24. Deposition of Schwanz, Jeffrey
25. Deposition of Warren/Nelson, Danielle
26. Dr. Charash Expert Report
27. Dr. Bentley Expert Report
28. Dr. Venters Expert Report
29. Plaintiff's Expert Rebuttal Reports
30. Family Photos (Plaintiff 006048-50)
31. Jail Floor Plan (MONROE_COUNTY_013863)
32. Spark Training Records (ACH 18713-18819)
33. JAB Management Services Records (ACH 18708- 12)
34. Intro to Correctional Healthcare Training Video Transcript
35. Detox in Jails Video Transcript
36. Jail is Not a Health Spa Video Transcript
37. December 21, 2019 Intake Screening (MONROE_COUNTY_001091-93)
38. December 21-22, 2019 Monroe County Booking Narrative Notes (MONROE_COUNTY_001095)
39. January 2, 2020 Supplemental Death Investigation Report by Jeffrey Spencer (MONROE_COUNTY_000079-81)
40. Policy and Procedure Index (MONROE_COUNTY_069539- MONROE_COUNTY_069799)
41. Continuous Quality Improvement Correspondences (MONROE_COUNTY_002686- MONROE_COUNTY_002691)
42. Signs of a Heart Attack (Deposition of Lisa Pisney, Exhibit 28)
43. Symptoms of Heart Attack (Deposition of Lisa Pisney, Exhibit 29)

44. Jail Booking Sheet (MONROE_COUNTY_001273–74)
45. Monroe County Policies and Procedures (MONROE_COUNTY_001441–88)
46. Monroe County Jail Policies and Procedures (MONROE_COUNTY_069539–799)
47. December 26, 2019 Hendrickson Email (ACH 19154)
48. January 15, 2020 Hendrickson Email (MONROE_COUNTY_008784)
49. December 31, 2019 Spencer Email (ACH 19157)
50. December 27, 2018 Hendrickson Email (MONROE_COUNTY_016524)
51. July 4, 2019 Fennigkoh Email re Question of the Day (MONROE_COUNTY_017959)
52. July 5, 2019 Fennigkoh Email re This is What I Plan to Send to Schamber (MONROE_COUNTY_018773)
53. July 5, 2019 Fennigkoh Email re Suggestions for Monroe County Jail (MONROE_COUNTY_056584)
54. November 2, 2019 Fennigkoh Email re Med Percentages October (MONROE_COUNTY_057799)
55. Fennigkoh Emails (ACH 22798-22803)
56. December 14, 2018 Perkins CQI Letter (MONROE_COUNTY_002686–91)
57. Monroe County Jail Inmate Handbook (MONROE_COUNTY_016979–7010)
58. Monroe County Observation Log (MONROE COUNTY 001103–04)
59. December 23, 2019 Gundersen Health Medical Records (Plaintiff 000245-46)
60. Boyer Death in Custody (Closeout Draft Notes) (Hendrickson Deposition Exhibit #74)
61. December 23, 2019 Gundersen Health Medical Records (Plaintiff 000287)
62. Boyer Gundersen Health Medical Records (Plaintiff 000245-000343)
63. December 21, 2019 Monroe County Narrative Notes (Plaintiff 000004)
64. December 22, 2019 Monroe County Narrative Notes (Plaintiff 000065)
65. December 23, 2019 Monroe County Narrative Notes (Plaintiff 000012-13)

66. December 23, 2019 Monroe County Narrative Notes (MONROE_COUNTY_001105)

67. December 23, 2019 Video Footage Narrative (MONROE_COUNTY_001105)

68. December 23, 2019 3:40am Fennigkoh Email (MONROE_COUNTY_004846)

69. December 23, 2019 Hallaman Email (MONROE_COUNTY_008772)

70. July 14, 2021 Hendrickson Email re Follow-Up Questions (WIDOC_2.16.22-000204-13)

71. December 21-23, 2019 Jail Staff List (MONROE_COUNTY_013680)

72. November 18, 2021 Wisconsin Department of Corrections Letter re Boyer Death in Custody (Hendrickson Deposition Exhibit #77)

73. December 24, 2019 Monroe County Narrative Notes (Plaintiff 000014)

74. December 31, 2019 Monroe County Narrative Notes (Plaintiff 000015)

75. Medication Administration Record (MONROE_COUNTY_001100)

76. Mediation Verification Form (MONROE_COUNTY_001094)

77. Autopsy Report (Plaintiff 002882-Plaintiff 002891)

78. Boyer Jail Medical Records (Plaintiff 000058-000221)

79. RN Bonus Program - Fennigkoh (DEF 227-229)

80. Boyer Subpoena Production (GB 000001 - GB 004228)

81. Gunderson Health Records Full (Plaintiff 007526-008826)

82. Gunderson Health System (GHS 1559)

83. Gunderson Heath System (GHS 1339-42)

84. HEALTHCARE POLICIES AND PROCEDURES (JA-05)
(MONROE_COUNTY_001441- MONROE_COUNTY_001488)

85. December 23, 2019-January 1, 2020 Gunderson Health Records (Plaintiff 008694-
Plaintiff 008826)

86. December 26, 2019 Written Notes (MONROE_COUNTY_068795-97)

87. Jail Staff Text Messages (MONROE_COUNTY_068798)

88. Monroe County Jail Emails (Plaintiff 000222-44)

89. Primary Report by Danielle Warren (MONROE_COUNTY_006457-58)

90. December 23, 2019 Warren and Hallman Emails (MONROE_COUNTY_006112)

91. December 26, 2019 Warren and Parker Emails (MONROE_COUNTY_004529-30)

92. December 24, 2019 Fennigkoh Email (MONROE_COUNTY_000095)

93. January 17, 2020 Hendrickson Email (MONROE_COUNTY_000108)

94. May 24, 2021 Fennigkoh Email (ACH 13997)

95. May 15, 2019 Fennigkoh Email (MONROE_COUNTY_056104-05)

96. Monthly Collection Analysis (MONROE_COUNTY_063476)

97. Fennigkoh Email (MONROE_COUNTY_056584)

98. Fennigkoh Email (MONROE_COUNTY_000088)

99. December 22, 2019 Email Parker to Jail Nurses (MONROE_COUNTY_005846)

100. Riley & Fennigkoh Emails (ACH 19151)

101. Preservation of Evidence Email and Letter (MONROE_COUNTY_00642)

102. Email & Letter re Preservation of Evidence (MONROE_COUNTY_006427-29)

103. Professional Services Subcontract Agreement (ACH 22660-22665)

104. MONROE_COUNTY_000001.mp4

105. MONROE_COUNTY_000003.mp4

106. MONROE_COUNTY_000004.mp4

107. MONROE_COUNTY_000005.mp4

108. MONROE_COUNTY_000006.mp4

109. MONROE_COUNTY_000007.mp4

110. MONROE_COUNTY_000008.mp4

- 111. MONROE_COUNTY_000009.mp4
- 112. MONROE_COUNTY_000010.mp4
- 113. MONROE_COUNTY_000011-Audio
- 114. MONROE_COUNTY_000593-Audio
- 115. MONROE_COUNTY_000594-Audio
- 116. MONROE_COUNTY_000595-Audio
- 117. MONROE_COUNTY_000596-Audio
- 118. MONROE_COUNTY_000597-Audio
- 119. MONROE_COUNTY_000598-Audio
- 120. MONROE_COUNTY_001514-Audio
- 121. MONROE_COUNTY_001515-Audio
- 122. MONROE_COUNTY_001516-Audio
- 123. MONROE_COUNTY_001517-Audio
- 124. MONROE_COUNTY_001518-Audio
- 125. MONROE_COUNTY_001519-Audio
- 126. MONROE_COUNTY_007482-Audio
- 127. MONROE_COUNTY_007483-Audio
- 128. MONROE_COUNTY_007484-Audio
- 129. MONROE_COUNTY_007485-Audio
- 130. MONROE_COUNTY_007487-Audio
- 131. MONROE_COUNTY_013609-Audio
- 132. MONROE_COUNTY_013610-Audio
- 133. MONROE_COUNTY_013611-Audio

- 134. MONROE_COUNTY_013612-Audio
- 135. MONROE_COUNTY_013613-Audio
- 136. MONROE_COUNTY_013614-Audio
- 137. Jail Calls Transcripts
- 138. Susan Minter Podcast Video 1
- 139. Susan Minter Podcast Video 2
- 140. Susan Minter Podcast Video 3
- 141. Susan Minter Podcast Video 4
- 142. Susan Minter Podcast Video 5
- 143. Susan Minter Podcast Video 6
- 144. Susan Minter Podcast Video 1 Transcript
- 145. Susan Minter Podcast Video 2 Transcript
- 146. Susan Minter Podcast Video 3 Transcript
- 147. Susan Minter Podcast Video 4 Transcript
- 148. Susan Minter Podcast Video 5 Transcript
- 149. Susan Minter Podcast Video 6 Transcript
- 150. Raw Data Report – Booking Cell 4
- 151. Mental Health Services Clinical Contact (MONROE_COUNTY_001096–97)
- 152. Monroe County Booking Records (ACH 000134–51)
- 153. Booking Floorplan (MONROE_COUNTY_003147)
- 154. Jail Floorplan (MONROE_COUNTY_004517)
- 155. Floorplan (MONROE_COUNTY_003147)
- 156. Chest Pain Protocol (MONROE_COUNTY_001098–99)

- 157. UW Health – Anatomic Pathology Laboratory Records (Plaintiff 000043-52)
- 158. Medtox Laboratory Report (Plaintiff 002167-68)
- 159. Narcotic Log (Plaintiff 000058-Plaintiff 000183)
- 160. 10 -Booking 109 -Housing 119 -TOTAL Facility Head Count
(MONROE_COUNTY_000082-87)
- 161. Demonstrative Exhibit Placeholder 1
- 162. Demonstrative Exhibit Placeholder 2
- 163. Demonstrative Exhibit Placeholder 3
- 164. Demonstrative Exhibit Placeholder 4
- 165. Demonstrative Exhibit Placeholder 5
- 166. Demonstrative Exhibit Placeholder 6
- 167. Demonstrative Exhibit Placeholder 7
- 168. Demonstrative Exhibit Placeholder 8
- 169. Demonstrative Exhibit Placeholder 9
- 170. Demonstrative Exhibit Placeholder 10

Plaintiff also reserves the right to call any Exhibits identified by Defendants in their Rule 26(a)(3) disclosures.

Dated: August 6, 2025

/s/ Maria Makar

One of Plaintiff's Attorneys

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